

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KENNETH PARKS AND WILLIAM  
SEYMOUR, On Behalf of Themselves and  
All Others Similarly Situated,

Plaintiffs,

v.

FAIRFAX FINANCIAL HOLDINGS LTD.,  
V. PREM WATSA, TREVOR AMBRIDGE,  
M. JANE WILLIAMSON, ANTHONY F.  
GRIFFITHS, ROBBERT HARTOG,  
BRADLEY P. MARTIN, AND BANC OF  
AMERICA SECURITIES LLC,

Defendants.

Civil Action No. 06-cv-2820

**MOTION OF KENNETH PARKS AND WILLIAM SEYMOUR FOR APPOINTMENT  
AS LEAD PLAINTIFFS FOR THE CLASS AND THE SUB-CLASS AND FOR  
APPROVAL OF LEAD PLAINTIFFS' SELECTION OF LEAD COUNSEL**

Kenneth Parks and William Seymour (collectively “Movants”) hereby move this Court under Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”) and 27(a)(3)(B) of the Securities Act of 1933, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), for their appointment to serve as Lead Plaintiffs on behalf of all persons who purchased public debt securities of Fairfax Financial Holdings LTD. between March 24, 2004 and March 21, 2006 inclusive seeking to pursue remedies under the Exchange Act and Rule 10b-5, promulgated thereunder (the “Class”); on behalf of a sub-class of Class members who purchased the 7.75% notes due 4/26/2012 pursuant to or traceable to the Offering Materials (the “Sub-Class”); and for the approval of their choice of Wolf Haldenstein Adler Freeman & Herz LLP as Lead Counsel. In support thereof, Movants, through their counsel, state as follows:

1. Movants, as the Proposed Lead Plaintiffs for the Class and Sub-Class, have timely filed their motion and, pursuant to the PSLRA, are believed to constitute the investors with the largest financial interest in the outcome of the case for the Class and the Sub-Class and are otherwise the most adequate lead plaintiffs. Movants satisfy the requirements of the PSLRA and Rule 23 of the Federal Rules of Civil Procedure in that their claims are typical of the claims of the Class and the Sub-Class and they will fairly and adequately represent the interests of the Class and the Sub-Class. Movants' choice of counsel should be accepted by this Court because their selected counsel is a nationally recognized firm with extensive experience and expertise in securities fraud and other class actions.

2. In further support of their motion, Movants rely on the accompanying Memorandum of Law and the Declaration of Gregory M. Nespole filed herewith.

Dated: June 12, 2006  
New York, New York

Respectfully submitted,

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By: \_\_\_\_\_/s/\_\_\_\_\_  
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**Proposed Lead Counsel**

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**Proposed Additional Plaintiffs' Counsel**

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